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UNITED STATES DISTRICT COURT SUPPRESSED

EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Plaintiff,

No.

4:16CR00146 CDP/SPM

INDICTMENT

## **COUNT ONE**

The Grand Jury charges that:

Defendants.

DONTRA SNIDER,

On or about, November 18, 2015, in the County of St. Louis, within the Eastern District of Missouri,

# DONTRA SNIDER,

having been convicted previously of a crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly possess one or more firearms which had previously traveled in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

#### **COUNT TWO**

The Grand Jury further charges that:

On or about November 18, 2015, in the County of St. Louis, within the Eastern District of Missouri,

### DONTRA SNIDER,

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1).

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### **FORFEITURE ALLEGATION**

The Grand Jury further finds probable cause that:

- 1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922 as set forth in Count One, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said offense.
- 2. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count Two, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.
- 3. If any of the property described above, as a result of any act or omission of the defendant(s):
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

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the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN United States Attorney

THOMAS J. MEHAN, #28958MO Assistant United States Attorney